

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Joshua Matthews

Case: 2:24-mj-30483

Case No. Assigned To : Unassigned

Assign. Date : 11/8/2024

Description: CMP USA V.
MATTHEWS (DJ)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 8, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section
18 U.S.C. § 922(g)(1)

Offense Description
Felon in possession of a firearm

This criminal complaint is based on these facts:
See attached affidavit.

☒ Continued on the attached sheet.


Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: November 8, 2024

City and state: Detroit, MI


Complainant's signature

Steven Allick, Special Agent, ATF
Printed name and title


Judge's signature

Hon. Kimberly G. Altman, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMIANL COMPLAINT

I. INTRODUCTION AND AGENT BACKGROUND

I, Steven Allick, being first duly sworn, hereby depose and state as follows:

1. I have personal knowledge of the facts set forth in this affidavit with the exception of the matters expressly stated to be based upon information and belief.

2. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and have been since May of 2014. I am currently assigned to the Detroit Field Division. I completed 26 weeks of training, which was comprised of the Criminal Investigator Training Program and the ATF Special Agent Basic Training program at the Federal Law Enforcement Training Center in Glynco, Georgia. I received extensive training on firearms identification, common scenarios involving firearms and narcotics trafficking, and identification and effects of controlled substances. Additionally, I received training on undercover investigations related to firearms and narcotics trafficking, which included investigative techniques and common subject behavior.

3. During my employment with ATF, I have participated in numerous investigations of criminal violations relating to firearms, violent crime, and narcotics. I have participated in various aspects of criminal investigations, including interviews, physical surveillance, and obtaining and executing search warrants. I am

familiar with and have employed various investigative methods, including electronic surveillance, visual surveillance, search warrants, and the utilization of confidential informants.

4. The facts in this affidavit come from my personal observations, interviews conducted by myself and/or other law enforcement agents, review of relevant police reports and information from others who have personal knowledge of the events and circumstances described herein, and my training and experience. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

5. Based on my training and experience and the facts set forth in this affidavit, there is probable cause to believe that Joshua MATTHEWS (DOB: 01/04/2002), a convicted felon, has possessed a firearm in violation of 18 U.S.C. § 922(g)(1).

II. PROBABLE CAUSE

6. In October 2024, I investigated a non-fatal shooting incident in Detroit on October 6, 2024. Fired cartridge casings left at the scene were linked to a 10mm firearm used in multiple recent shootings through the National Integrated Ballistic Information Network (NIBIN) On October 6, 2024, Detroit Police Department (DPD) Officers responded to multiple ShotSpotter police runs on Fenkell Avenue in Detroit, Michigan. Upon arrival, Officers were flagged down by a female, who stated her cousin was shot. Officers encountered a victim who was lying on the floor

with his head wrapped in several shirts covered in blood. A witness stated a black Jeep Grand Cherokee stopped in front of the location and fired multiple shots. Medics transported the victim to Sinai Grace Hospital and determined he had a graze wound to his ear from a bullet. Officers encountered another witness who was rendering aid and was in possession of two firearms. Per the witness, there was a music video being filmed at the location when a dark colored Jeep pulled up on Fenkell Ave. and Lauder Street and the rear passenger fired about five shots. The witness stated that he returned fire with his 9mm pistol, firing 16 rounds, before firing an additional round with another witness's 9mm pistol. Officers spoke with the owners of the building, who stated they were closing the building for the night when a black Grand Cherokee travelled down Fenkell with its headlights off, stopped in front of the building, and started shooting. The 10mm casings were all collected on Fenkell Ave. in the vicinity of where the Jeep stopped.

REVIEW OF SURVEILLANCE FOOTAGE

7. I reviewed surveillance footage from the shooting incident, and Green Light video from a nearby gas station prior to the shooting. After review of the video and further investigation, agents identified MATTHEWS as the suspect in the shooting based upon the unique clothing and jewelry he was wearing and the identification of the vehicle used in the shooting. Location data for MATTHEWS's phone also placed him in the vicinity of the shooting scene at the time of the shooting

SEARCH WARRANT

8. On November 7, 2024, I obtained applied for and obtained a federal search warrant for MATTHEWS's residence.

9. On November 8, 2024, agents executed the search warrant. Upon entry into the residence, law enforcement encountered MATTHEWS coming from the southwest bedroom, later identified as his bedroom. MATTHEWS told law enforcement that he is currently on probation and has a Glock 20 on the headboard for his bed. Law enforcement also encountered two adult females and a juvenile inside the residence. The following items were found inside the residence:

- a. Glock, model 20, 10mm pistol, loaded with one round in the chamber and 15 rounds in the magazine, located on the headboard in MATTHEWS's bedroom. In close proximity was MATTHEWS's cell phone and his wallet containing identification.
- b. Duffle bag inside the closet of MATTHEWS's bedroom, containing assorted ammunition and three firearms:
 - i. Romarm Cugir, mini draco, 7.62x39 caliber, loaded with one round in the chamber and a magazine with 29 live rounds.
 - ii. Zastava pistol, 7.62x39 caliber, no round in the chamber.
 - iii. American Tactical, model Omni Hybrid, multi-caliber pistol, loaded with one round in the chamber and a magazine with 39 live rounds.

- c. The distinctive clothing MATTHEWS wore during the October 6, 2024, shooting incident to include sweatshirt, pants, boots, and necklaces.

10. I spoke with ATF Interstate Nexus Expert, Special Agent Joshua McLean. Special Agent McLean stated that each of the above-mentioned firearms recovered during the search warrant on November 8, 2024, were manufactured outside the State of Michigan. Therefore, the firearms traveled in, and/or affected interstate commerce to arrive in the state of Michigan.


11. I reviewed MATTHEWS criminal history which notes he is currently on felony probation and under the conditions of probation, MATTHEWS cannot possess weapons. MATTHEWS has the following felony convictions:

- a. 2023- Felony Breaking and Entering a Building-3rd Circuit Court-Wayne County, MI.
- b. 2023- Felony Assaulting/Resisting/Obstructing a Police Officer-3rd Circuit Court-Wayne County, MI

III. CONCLUSION

12. Based on this information and MATTHEWS possession of the firearms on November 8, 2024, there is probable cause to believe that MATTHEWS violated 18 U.S.C. § 922(g)(1) by being a convicted felon in possession of a firearm. This violation occurred in the Eastern District of Michigan.

Respectfully submitted,



Steven Allick, Special Agent
Alcohol, Tobacco, & Firearms

Sworn to before me and signed in my
presence and/or by reliable electronic means.



Hon. Kimberly G. Altman
United States Magistrate Judge

Dated: November 8, 2024